



**Georgia Department of Education
Office of the State Superintendent of Schools
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April 28, 2000

**Linda C. Schrenko
State Superintendent of Schools**

FD 2000 Project Coordinator
Food Distribution Division – FNS
3101 Park Center Drive
Ford Avenue Building, Room 601
Alexandria, Virginia 22302

Dear Project Coordinator:

In 1985, I left my work as a school nutrition director of a 23 schools school system. The commodities we received were high in fat and many were undesirable. In 1998, as an area consultant with the Georgia Department of Education assisting 37 counties in the middle Georgia area, I was amazed and impressed with the changes in the USDA products. It was obvious consumer demand and need were addressed helping the school nutrition program meet the dietary guidelines for reducing fat.

It is for the above reason that I am dismayed the federal government is proposing substantial changes in the Food Distribution Program. In an assessment performed by USDA, the Child Nutrition Operations Study, Second Year 1992, 71% of the school food service managers interviewed rated the overall performance of the food distribution system as excellent or very good. In reviewing the 16 proposed changes some would be beneficial such as:

1. Developing written hold and recall procedures.
2. Decreasing the time for product holds at the school level.
3. Publishing commodity recall reimbursement procedures.

There are several points, however, that I am adamantly opposed to such as:

1. Allowing vendors to use commercial labels on commodity foods. This would make it virtually impossible to keep accurate inventory records and food costs. Maintaining records of purchased food cost and commodity food is a management valuable tool. School nutrition workers already have difficulty recording their food usage correctly. With the above change, purchased food cost and commodity food cost would no longer be an effective tool in management because of the inaccuracy.

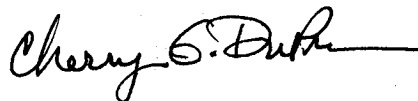
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2. Allowing full substitutability. Although we would like to believe that all vendors are basically honest, many times we have found the opposite to be true. Managers have to be vigilant when receiving orders to ensure that the vendors have not substituted inferior products. I do not feel comfortable with the idea of giving high quality USDA products to vendors and having them substitute a different product to send to our schools.
3. Providing computer connectivity to the school district level. Although this is a wonderful concept, it is currently an impractical one. Many of the smaller districts I serve lack the technology and trained staff to utilize computers efficiently.

There is too little information on USDA's web site and in the proposal for change to comment on the pilots. I strongly feel that prior to beginning the pilots, baseline information/data, expected outcomes, and evaluation methods be established and published.

The Food Distribution Program in Georgia has been a wonderful complement to the school nutrition program. Instead of completely changing a program that will affect over 60,000 school food authorities nationwide, it would appear to be more beneficial to observe a program that is effective and emulate it. The 37 counties I work with here in Georgia are happy with the Food Distribution Program as it functions. Let's leave it that way! Will tabulated comment information be available for access so I may see the nature of other comments submitted in response to the proposal for changes? Thank you.

Sincerely,



Cherry G. DuPree
Area Consultant

CGD:mfs
cc: Eugenia Seay

FDD-PST

From: cdupree@doe.k12.ga.us
Sent: Friday, April 28, 2000 3:12 PM
To: fdd-pst@fns.usda.gov
Subject: FD 2000

As Area Consultant in the Middle Georgia Region of Georgia serving 37 counties, the following comments are submitted on the February 14, 2000, USDA Proposal for Change:

I am totally opposed to allowing vendors to use commercial labels and to expanding full substitutability of commodity product. These two proposed changes would create more problems tracking and accounting USDA foods as well as food safety problems.

I would like to see the following: test best value contracting, move toward national umbrella contracts with processors (based on implementation), facilitate the processing of commodities with limited demand, develop written hold and recall procedures, reduce the duration of product hold at the school level, publish commodity recall reimbursement procedures, and relax truckload requirements.

There is too little information on USDA's website and in the proposal for change to comment on the pilots. Prior to beginning the pilots, establish and publish baseline information/data, expected outcomes, and evaluation methods.

Please tabulate and make available for access comment information so I may see the nature of other comments submitted in response to the proposed changes.

Thank you.